

District Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JULIO CURY and TAKAO YAMADA,

Plaintiffs,

v.

DEPARTMENT OF STATE, and  
DEPARTMENT OF HOMELAND  
SECURITY,

Defendants.

Case No. 2:23-cv-00499-JLR

STIPULATION FOR AN EXTENSION  
OF TIME

Noted for Consideration:  
January 15, 2024

After further review, Plaintiffs notified Defendants that Plaintiffs have decided to narrow the scope of issues to be litigated. The only remaining issue that Plaintiffs will contest is the appropriateness of the State Department's withholdings made pursuant to 5 U.S.C. § 552(b)(3) prior to December 31, 2011, that are addressed in Defendants' motion for summary judgment, Dkt. 26.<sup>1</sup> Plaintiffs are no longer challenging any searches or any other withholdings either by the State Department or Customs and Border Protection. In light of Plaintiffs' revised position, the parties would like to see if a further compromise can be reached.

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<sup>1</sup> Plaintiffs agree that any cross-motion for summary judgment it may file would also be limited to this one issue.

1 As such, the parties need additional time to negotiate, and Plaintiffs would need to revise  
2 their opposition to address only the propriety of the State Department's (b)(3) withholdings it  
3 made on or before December 31, 2011.

4 In light of these developments, the parties have stipulated to and propose to extend the  
5 current briefing schedule by approximately six weeks.

6 Thus, the parties stipulate to and propose the following schedule:

- 7 1. Plaintiffs will file an opposition and potential cross-motion for summary judgment  
8 limited to whether State Department's withholdings pursuant to 5 U.S.C. § 552(b)(3)  
9 prior to December 31, 2011 were proper. That motion will be filed on or before  
10 March 3, 2025; and
- 11 2. Defendant State Department will file its reply and opposition to any cross-motion on  
12 or before March 24, 2025.
- 13 3. Plaintiffs will file their reply in support of any cross-motion on or before April 14,  
14 2025.

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1 DATED this 16th day of January, 2025.

2 Respectfully submitted,

3 NATIONAL SECURITY COUNSELORS

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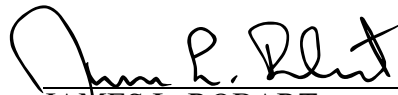
11 *Attorneys for Defendants*

12 I certify that this memorandum contains 264  
13 words, in compliance with the Local Civil Rules.

~~PROPOSED~~ ORDER

It is so ORDERED.

Dated this 16th day of January, 2025.

A handwritten signature in black ink, appearing to read "James L. Robart", written over a horizontal line.

JAMES L. ROBART  
United States District Judge